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2011 JUN -9 PM 12:44  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODNEY L. BROWN,

Defendant.

INDICTMENT

CASE NO.

**3:11CR261**

Title 18, Sections 1591(a)(1) and (2),  
and (b)(1), 2421, 924(c)(1)(A),  
922(g)(1) and 1594(d)

**JUDGE ZOUHARY**

COUNT 1

The Grand Jury charges:

From on or about March 29, 2011, and continuing through April 5, 2011, in the Northern District of Ohio, Western Division, the defendant, RODNEY L. BROWN, did knowingly recruit, entice, harbor, transport, provide and obtain by any means, in and affecting interstate commerce, an individual, identified herein as "SEH," knowing and in reckless disregard of the fact that means of force, fraud, and coercion would be used to cause "SEH" to engage in a commercial sex act, and that RODNEY L. BROWN would benefit financially by receiving things of value

from participation in such conduct, all in violation of Title 18, United States Code, Sections 1591(a)(1) and (2), and (b)(1).

COUNT 2

The Grand Jury further charges:

From on or about April 4, 2011, through on or about April 5, 2011, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, RODNEY L. BROWN, did knowingly transport, and attempt to transport, an individual identified herein as "SEH," in interstate commerce, from Toledo, Ohio, and traveling to Indianapolis, Indiana, with intent that "SEH" engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2421.

COUNT 3

The Grand Jury further charges:

During in and about September 2010, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, RODNEY L. BROWN, did knowingly transport and cause to be transported, an individual identified herein as "AH," in interstate commerce, from the State of Ohio to Indianapolis, Indiana, with intent that "AH" engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2421.

COUNT 4

The Grand Jury further charges:

During in and about September 2010, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, RODNEY L. BROWN, did knowingly transport and cause to be

transported, an individual identified herein as "CH," in interstate commerce, from the State of Ohio to Indianapolis, Indiana, with intent that "C.H" engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2421.

COUNT 5

The Grand Jury further charges:

From on or about March 29, 2011, to on or about April 5, 2011, in the Northern District of Ohio, Western Division, the defendant, RODNEY L. BROWN, did knowingly carry and use a firearm, that is, a Mossburg Model 500A shotgun, Serial No. SR353112, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is sex trafficking by force, fraud, and coercion, Title 18, United States Code, Sections 1591(a)(1) and (2), and (b)(1), all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 6

The Grand Jury further charges:

From on or about March 29, 2011, to on or about April 5, 2011, in the Northern District of Ohio, Western Division, the defendant, RODNEY L. BROWN, having been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, robbery in violation of Ohio Revised Code, Section 2911.02, did knowingly possess in and affecting interstate commerce, a firearm, that is, a Mossburg Model 500A shotgun, Serial No. SR353112, said firearm having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE**

**FORFEITURE - 18 U.S.C. § 1594(d)**

1. The allegations contained in Count 1 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1594(d). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all property, real and personal, that was used, or was intended to be used, to commit or to facilitate the commission of the offense; and, all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense; including, but not limited to:

- a.) Black LG Phone.
- b.) Tom Tom Navigation device.
- c.) Cell phone.
- d.) Nikon Camera D-40, s/n 3158575.
- e.) Sony PSP game station.
- f.) Sprint LG Phone.
- g.) Alltel LG Phone.
- h.) Boost Mobil Cell.
- i.) 2G SD Card.
- j.) Nikon Digital Camera, model Cool Pix.
- k.) Verizon Cell phone.
- l.) Emerson Flat Screen TV, s/n J21729319, w/stand and remote.
- m.) Phillips Monitor, s/n AU1A0846005323.
- n.) HP Laptop, s/n CNF4091MJF.

- o.) Toshiba Laptop, s/n 17231827K.
- p.) Samsung TV, s/n Z1MG3CYZ401882P.
- q.) E-Machine computer, s/n W52543.
- r.) Panasonic Big Screen TV, s/n TKKL5266.
- s.) Sony Playstation 3 w/controller and cords, s/n CECH2001A.
- t.) HP Laptop w/power supply, s/n CND8294NPN.
- u.) Alltel HTC Telephone, s/n HT93XH700807.
- v.) Kyocera Cell Phone, FCCID OVFKWC - M1000-2X0.
- w.) Boost Mobile Blackberry, ESN HEX:80F97DDA.
- x.) Sony Cybershot Camera, Model DSC-W310, s/n 1136372.
- y.) Car Charger, PCP-MTV3.
- z.) Samsung wall charger.
- aa.) Nylon Laptop bag, black in color.

**FORFEITURE - 18 U.S.C. § 2428(a)**

1. The allegations contained in Count 2 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2428(a). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all property, real and personal, that was used, or was intended to be used, to commit or to facilitate the commission of the offense; and, all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense; including, but not limited to:

- a.) HP Laptop w/power supply, s/n CND8294NPN.

- b.) Alltel HTC Telephone, s/n HT93XH700807.
- c.) Kyocera Cell Phone, FCCID OVFKWC - M1000-2X0.
- d.) Boost Mobile Blackberry, ESN HEX:80F97DDA.
- e.) Sony Cybershot Camera, Model DSC-W310, s/n 1136372.
- f.) Car Charger, PCP-MTV3.
- g.) Samsung wall charger.
- h.) Nylon Laptop bag, black in color.

**FORFEITURE - 18 U.S.C. § 2428(a)**

1. The allegations contained in Count 3 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2428(a). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all property, real and personal, that was used, or was intended to be used, to commit or to facilitate the commission of the offense; and, all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

**FORFEITURE - 18 U.S.C. § 2428(a)**

1. The allegations contained in Count 4 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18 United States Code, Section 2428(a). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all property, real and personal, that was used, or was intended to be used, to commit or to facilitate the

commission of the offense; and, all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

**FORFEITURE - 18 U.S.C. § 924(d)(1) & 28 U.S.C. § 2461(c)**

1. The allegations contained in Count 5 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all firearms and ammunition involved in or used in the offense; including, but not limited to:

- a.) Mossburg Model 500A shotgun, s/n SR353112.

**FORFEITURE - 18 U.S.C. § 924(d)(1) & 28 U.S.C. § 2461(c)**

1. The allegations contained in Count 6 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c). Upon conviction of this offense, defendant RODNEY L. BROWN shall forfeit to the United States all firearms and ammunition involved in or used in the offense; including, but not limited to:

- a.) Mossburg Model 500A shotgun, s/n SR353112.

**A TRUE BILL.**

Original document – Signatures on file with the Clerk of courts, pursuant to the E-Government Act of 2002.